

## EXHIBIT 1

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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RAMON DIAZ, et al.,

**CIVIL ACTION NO.:**

2:19-cv-01664-JMY

Plaintiffs,

vs.

BTG INTERNATIONAL, INC., et al.,

Defendants.

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**SUPPLEMENTAL DECLARATION OF JENNIFER M. KEOUGH REGARDING  
NOTICE ADMINISTRATION**

I, JENNIFER M. KEOUGH, declare and state as follows:

1. I am the Chief Executive Officer of JND Legal Administration LLC (“JND”). JND is a legal administration services provider with its headquarters located in Seattle, Washington. JND has extensive experience with all aspects of legal administration and has administered settlements in hundreds of class action cases.

2. JND is serving as the Settlement Administrator<sup>1</sup> in the above-captioned litigation (“Action”) as ordered by the Court in its Order Preliminarily Approving the Settlement, Certifying the Settlement Class, Approving Notice to the Settlement Class, and Scheduling Fairness Hearing (“Preliminary Approval Order”).

3. This Supplemental Declaration is meant to supplement my previous declaration dated December 7, 2020.

**NOTICE MAILING**

4. On October 9, 2020, JND sent the Court-approved Class Notice via U.S. Postal Service first-class mail to 1,555 Settlement Class members.

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<sup>1</sup> Capitalized terms used and otherwise not defined in this Declaration shall have the meanings given such terms in the Settlement Agreement.

5. As of the date of this Supplemental Declaration, JND tracked 96 Class Notices that were returned to JND as undeliverable. Of these undeliverable Class Notices, JND performed advanced address research and re-mailed 48 Class Notices to updated addresses. Four (4) re-mailed Class Notices were returned as undeliverable.

6. As of the date of this Supplemental Declaration, 1,503 Settlement Class members were mailed a Class Notice which was not returned as undeliverable.

7. As of the date of this Supplemental Declaration, 52 Class Notices remain undeliverable, resulting in a 96.65% Class Notice delivery success rate.

#### **SETTLEMENT WEBSITE**

8. On October 9, 2020, JND established a Settlement Website ([www.BTGInternationalERISASettlement.com](http://www.BTGInternationalERISASettlement.com)), which hosts copies of important case documents, such as the Settlement Agreement with Exhibits, answers to frequently asked questions, and includes contact information for Class Counsel and the Settlement Administrator.

9. As of the date of this Supplemental Declaration, the Settlement Website has tracked 199 unique users who registered 415 page views.

#### **TOLL-FREE INFORMATION LINE**

10. On October 9, 2020, JND established a case-specific toll-free telephone number (1-888-921-0723) for Settlement Class members to call to obtain information about the Settlement. The toll-free number is accessible 24 hours a day, seven (7) days a week.

11. As of the date of this Supplemental Declaration, the toll-free number has received 29 calls.

#### **OBJECTIONS**

12. The Class Notice informed recipients that any Settlement Class member who wished to object to approval of the Settlement could do so by submitting a written statement to the Court no later than December 24, 2020.

13. As of the date of this Supplemental Declaration, JND has not received copies of any objections.

I declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Executed on January 6, 2021 at Seattle, Washington.



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JENNIFER M. KEOUGH